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*Jeffrey M. Nelson*  
*Chief Counsel & Director of Legal Services*

November 20, 2017

**VIA ELECTRONIC FILING**

Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: Service of Discovery  
**Docket No. 2014-346-WS**

Dear Ms. Boyd:

ORS strenuously objects to the timeline which counsel has attempted to impose on ORS for responses to the recently submitted discovery requests.

Under the provisions of Reg. 103-833 of the S.C. Code Ann. Regs., Parties are provided with twenty (20) days to respond to written interrogatories and requests for production of documents.

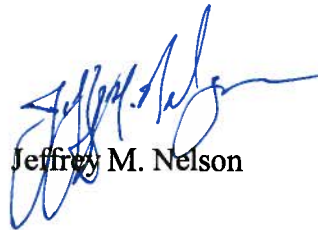
The expedited schedule in this case which Mr. Gressette refers to is a timeline which DIU requested, not ORS or the other Intervenor. ORS should not be forced to respond to an absurdly short discovery schedule which is the result of the Applicants own request to expedite the schedule in this case.

Additionally, both Thursday November 23<sup>rd</sup> and Friday November 24<sup>th</sup> are State Holidays and the Office of Regulatory Staff is closed. The Applicant is thus essentially requesting ORS to prepare responses to extensive discovery requests in just three working days. This is impossible. The ORS staff is also currently working on two other large water/sewer rate cases as well as numerous issues involving the VC Summer nuclear project.

ORS will begin to prepare appropriate responses to the discovery requests but will be unable to provide responses on the day after Thanksgiving.

ORS asks that the Commission, or hearing officer in this matter, issue an Order providing that ORS is relieved from having to reply to the Applicants recently filed Discovery requests. Alternatively, we would ask that the Commission issue an Order providing a more reasonable timeline for ORS to reply to the Applicants discovery requests.

Sincerely,



Jeffrey M. Nelson

cc:

David Butler, Esquire (via E-Mail)  
Thomas P. Gressette Jr., Esquire (via E-Mail)  
John J. Pringle, Esquire (via E-Mail)  
John F. Beach, Esquire (via E-Mail)  
G. Trenholm Walker, Esquire (via E-Mail)  
Vicki Volponi, Esquire (via E-Mail)  
John F. Guastella, Esquire (via E-Mail)